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Attorney for Plaintiff TRACY ROGERS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRACY ROGERS,

Plaintiff,

vs.

NATIONAL SECURITY TECHNOLOGIES,
LLC, a Delaware Limited Liability Company;
Does I-X; Roe Corporations I-X,

Defendants.

Case No. 2:18-cv-00278-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND TIME RE: SETTLEMENT**

Pursuant to the court's January 14, 2019 Order (ECF No. 27) Plaintiff TRACY ROGERS, and Defendant NATIONAL SECURITY TECHNOLOGIES, LLC, by and through their respective attorneys of record hereby stipulate and request the court to approve an extension of time to submit a notice of settlement, dismissal paperwork, or Proposed Joint Pre-Trial Order through and including February 28, 2019. The Parties stipulate and represent as follows:

1. The Parties have reached a resolution of the case by and between themselves;
2. The Plaintiff is presently a Debtor in a Chapter 13 Bankruptcy Case in the District of Nevada (#BK-S-18-10483-MKN);
3. As a result of the Plaintiff's pending bankruptcy reorganization the approval of the settlement must be obtained from the Bankruptcy Court;
4. A motion seeking approval is pending a hearing on January 30, 2019 at 2:30 p.m. before the Honorable Mike Nakagawa in Bankruptcy Court;

- 1 5. The Plaintiff has represented to Defendant that there is no anticipated problems with
- 2 obtaining the approval of the Bankruptcy Court and to Plaintiff's knowledge, based upon
- 3 a review of the Bankruptcy Court docket, there have not been any objections or
- 4 oppositions filed to the request to employ Plaintiff's counsel and to approve the
- 5 settlement;
- 6 6. Everything else to satisfy the settlement terms has been completed and a proposed order
- 7 of dismissal has been drafted. As soon as approval from the Bankruptcy Court is
- 8 obtained the Parties will be submitting the dismissal papers;
- 9 7. The Parties estimate, in good faith, that this matter will be concluded by February 28,
- 10 2019 and stipulate and request that the court extend the time to submit notice of
- 11 settlement, dismissal papers, or a Proposed Joint Pre-Trial Order through February 28,
- 12 2019.
- 13 .

14 DATED this 23rd day of January 2019.

15 **JACKSON LEWIS P.C.**

16 /s/ Joshua A. Sliker, Esq.

17 Joshua A. Sliker, Esq.
18 Attorneys for Defendant

DATED this 23rd day of January 2019.

KEMP & KEMP

/s/ James P. Kemp, Esq.

James P. Kemp, Esq.
Attorneys for Plaintiff

21 **IT IS SO ORDERED.**

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: January 24, 2019